

EXHIBIT B

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Presentment Date: December 7, 2011
Time: 12:00 p.m.

SECURITIES INVESTOR PROTECTION
CORPORATION,

Objections Due: December 7, 2011
Time 11:00 p.m.

Plaintiff-Applicant,

v.

Adv. Pro. No. 08-01789 (BRL)

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

SIPA Liquidation

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

**ORDER GRANTING TRUSTEE'S MOTION TO RETAIN SOROKER –
AGMON AS SPECIAL COUNSEL *NUNC PRO TUNC* AS OF SEPTEMBER 20, 2011**

Upon the motion (the “Motion”) of Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, and the estate of Bernard L. Madoff, for authority to retain Soroker – Agmon (“Soroker Agmon”), as special counsel, *nunc pro tunc*, as of September 20, 2011, and due and proper notice having been given under the circumstances of this case, and the Securities Investor Protection Corporation having specified Soroker Agmon as special counsel, and after due deliberation,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Court finds that Soroker Agmon is hereby deemed disinterested under 15

U.S.C. § 78eee(b)(6)(B).

3. The Trustee is authorized to retain Soroker Agmon as special counsel to the Trustee as provided in the Motion, *nunc pro tunc*, as of September 20, 2011.

Dated: New York, NY
_____, 2011

HONORABLE BURTON R. LIFLAND
UNITED STATES BANKRUPTCY JUDGE